

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

JEREMIAH DION WRIGHT

Case: 2:21-mj-30526
Case No. Judge: Unassigned,
Filed: 11-08-2021 At 04:02 PM
USA v. SEALED MATTER (CMP)(MLW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 21, 2021 in the county of Oakland in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(n)	Receipt of a firearm while under indictment

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.



Complainant's signature

Special Agent Brett J. Brandon, ATF

Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: November 8, 2021



Judge's signature

City and state: Detroit, Michigan

Hon. Anthony P. Patti, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Brett J. Brandon, being first duly sworn, hereby state:

1. I have been a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, assigned to the Detroit Field Division since July 2013. I graduated from the Criminal Investigator Training Program and the ATF Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. During my employment with ATF, I have conducted and/or participated in numerous criminal investigations involving the illegal possession, use, and sale of firearms, drug trafficking violations, and criminal street gangs.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

3. The ATF is currently conducting a criminal investigation concerning JEREMIAH DION WRIGHT (DOB: XX/XX/2001). This affidavit does not include all the information, known to law enforcement, related to this investigation. This affidavit does include sufficient evidence to establish probable cause that WRIGHT received a firearm while under indictment, in violation of 18 U.S.C. § 922(n).

PROBABLE CAUSE

4. On April 16, 2020, after pleading guilty to felony carrying a concealed weapon in the Sixth Judicial Court, Oakland County, Michigan, WRIGHT was sentenced to eighteen months' probation under the Holmes Youthful Trainee Act (HYTA). I am aware that an individual sentenced pursuant to HYTA qualifies as "any person who is under indictment for a crime punishable by imprisonment for a term exceeding one year" for the purposes of 18 U.S.C. § 922(n).

5. On September 21, 2021, Oakland County Sheriff's Deputies, during patrol, heard several gunshots west of their current location. Dispatch subsequently advised of a shooting in the area of West Wilson Avenue. The deputies responded. As they drove to the location, witnesses at or near the incident advised that people down the street were shooting. The deputy continued down the street and witnesses pointed to an older model Chevrolet Suburban parked in front of 293 West Wilson Avenue. Witnesses advised "they were shooting in front of the truck." The deputy observed unidentified individuals retreat into the 293 West Wilson Avenue location. The deputy then spoke to individuals on the porch of a neighboring residence. The individuals reported that people were shooting back and forth at each other and one of the shooters was in 293 West Wilson Avenue.

6. Another witness identified WRIGHT as the individual they saw holding a black handgun during the incident.

7. The deputy contacted Cheneka Fowler at 293 West Wilson. Ms. Fowler stated that she was inside her residence with her children when someone with a mask started shooting and she laid on the floor. The deputy requested Ms. Fowler call everyone out of the home and Ms. Fowler complied. After everyone exited, Ms. Fowler gave consent to search the residence. Deputies encountered Jeremiah WRIGHT in the kitchen, secured him in handcuffs, and led him out of the residence.

8. Deputies then spoke to Ms. Fowler again. She reported that she did not see WRIGHT with a firearm. Ms. Fowler gave consent to search the resident for a firearm. Deputies searched the residence and located one black Glock P80 9mm pistol bearing serial number “BRCS494” inside of a Crocs shoebox in the west bedroom.

9. During the investigation, deputies recovered twenty-two fired cartridge cases in front of 293 West Wilson Avenue. Two 9mm fired cartridge cases were also recovered one-tenth of a mile east, in front of 207 West Wilson Avenue. According to the Oakland County Forensic Science Laboratory, all twenty-four 9mm fired cartridge cases had similar characteristics to the Glock P80 9mm pistol recovered from Ms. Fowler’s home at 293 West Wilson Avenue.

10. During a post-Miranda interview, WRIGHT acknowledged that he could not have a firearm due to a “pending firearm charge” against him. WRIGHT denied owning or possessing a firearm and denied his involvement in the shooting.

11. The detective then re-interviewed Ms. Fowler. She provided the following information:

- a. She was on the porch with her children when she observed a black vehicle with tinted windows drive slowly down the street;
- b. She observed a black male wearing a mask shooting a firearm from the vehicle;
- c. She dropped to the floor and did not see anything further; and
- d. Her daughter’s “baby daddy,” WRIGHT, ran into the home and hid.

12. I reviewed evidentiary photos from the consent search. The black Glock P80 9mm pistol was recovered inside of a Crocs shoebox containing pink Crocs. There were baby diapers and wipes located on the bed in the same bedroom. Ms. Fowler told deputies that WRIGHT is her daughter’s “baby daddy.” Therefore, it appears that the Glock P80 9mm pistol was hidden in her daughter’s bedroom.

13. On November 2, 2021, Special Agent Kenton Weston and I conducted a voluntary interview of WRIGHT at 293 West Wilson Street. WRIGHT made the following statements:

- a. He was present the day of the shooting and the consent search of the residence;
- b. He was arrested during the incident but was never charged;
- c. When asked if he was on probation or parole, he replied, “yeah I’m on probation right now;”
- d. He further explained that he was on “felony probation;”
- e. He clarified that he was on “HYTA” probation;
- f. I then asked how “HYTA” worked. WRIGHT replied, “The HYTA is like, you feel me, they most likely going to take it because [sic] expunge my record if I don’t get in trouble . . . ;”
- g. I then asked WRIGHT to clarify, and WRIGHT again explained that if he successfully completed HYTA, his felony charge would be expunged. I then asked WRIGHT if “technically like still charged with it [referencing his underlying offense]?” WRIGHT replied, “Oh yea, basically, yea.” I then asked, “[s]o, are you still charged with it until you complete it? Is that how it works?” WRIGHT replied, “Yeah;”
- h. He stated that the only people in the residence when the incident occurred were his girlfriend, Ms. Fowler, “the kids”, and himself;

- i. he was in the kitchen during the incident; and
- j. He denied knowing which room the firearm came from.

14. On November 3, 2021, I interviewed OCSO Deputy Charles Piotrowski, who located the black Glock P80 9mm pistol and encountered WRIGHT in the kitchen during the consent search. Deputy Piotrowski reported that he located the firearm in a Crocs shoebox in the closet in the west bedroom. There were several pairs of Crocs sandals in the closet. He described the room as belonging to a young adult female based on the clothing, furniture, shoes, and bed spread.

15. I reviewed the Firearms Trace Summary for the Glock P80 9mm pistol. The firearm was purchased by R.B.D. (an individual whose identity is protected herein by using his/her initials) on January 17, 2021, from Sportsman's Warehouse #601, a federal firearms licensee located in Troy, Michigan. The purchase of the firearm occurred after WRIGHT was placed on HYTA probation.

16. On November 5, 2020, I spoke to ATF Interstate Nexus Expert and Special Agent Michael Jacobs. Special Agent Jacobs was provided with a verbal description of the firearm. Based upon the verbal description, Special Agent Jacobs advised that the firearm qualifies as a firearm as defined under 18 U.S.C. § 921 and manufactured outside of the state of Michigan after 1898, and therefore had traveled in and affected interstate commerce.

CONCLUSION AND SUMMARY OF THE EVIDENCE

17. WRIGHT was on HYTA during the shooting incident on September 21, 2021, in Pontiac, Eastern District of Michigan. A witness saw WRIGHT holding a black handgun during the incident. Ms. Fowler reported that WRIGHT ran into her home and hid. The black Glock P80 9mm pistol was found hidden in Ms. Fowler's daughter's room who is also the mother of WRIGHT's child. WRIGHT, Ms. Fowler, and Ms. Fowler's children were the only people in the house. A preliminary examination of the twenty-two fired cartridge casings recovered in front of Ms. Fowler's home matched the Glock black P80 9mm pistol recovered from her home. Probable cause exists that WRIGHT possessed the firearm, which was used during the shootings, and hid it in Ms. Fowler's home.

18. WRIGHT knew he was on HYTA and understood that his case was still pending. The gun was purchased from a federal firearm licensee after WRIGHT was placed on HYTA. Therefore, WRIGHT must have received the firearm after he was under indictment.

19. Probable cause exists that JEREMIAH DION WRIGHT, a person under indictment, did receive one black Glock P80 9mm pistol, a firearm having affected interstate commerce, while under indictment, in violation of 18 U.S.C. § 922(n).

Respectfully submitted,



Brett J. Brandon
ATF Special Agent

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Hon. Anthony P. Patti
United States Magistrate Judge

Dated: November 8, 2021